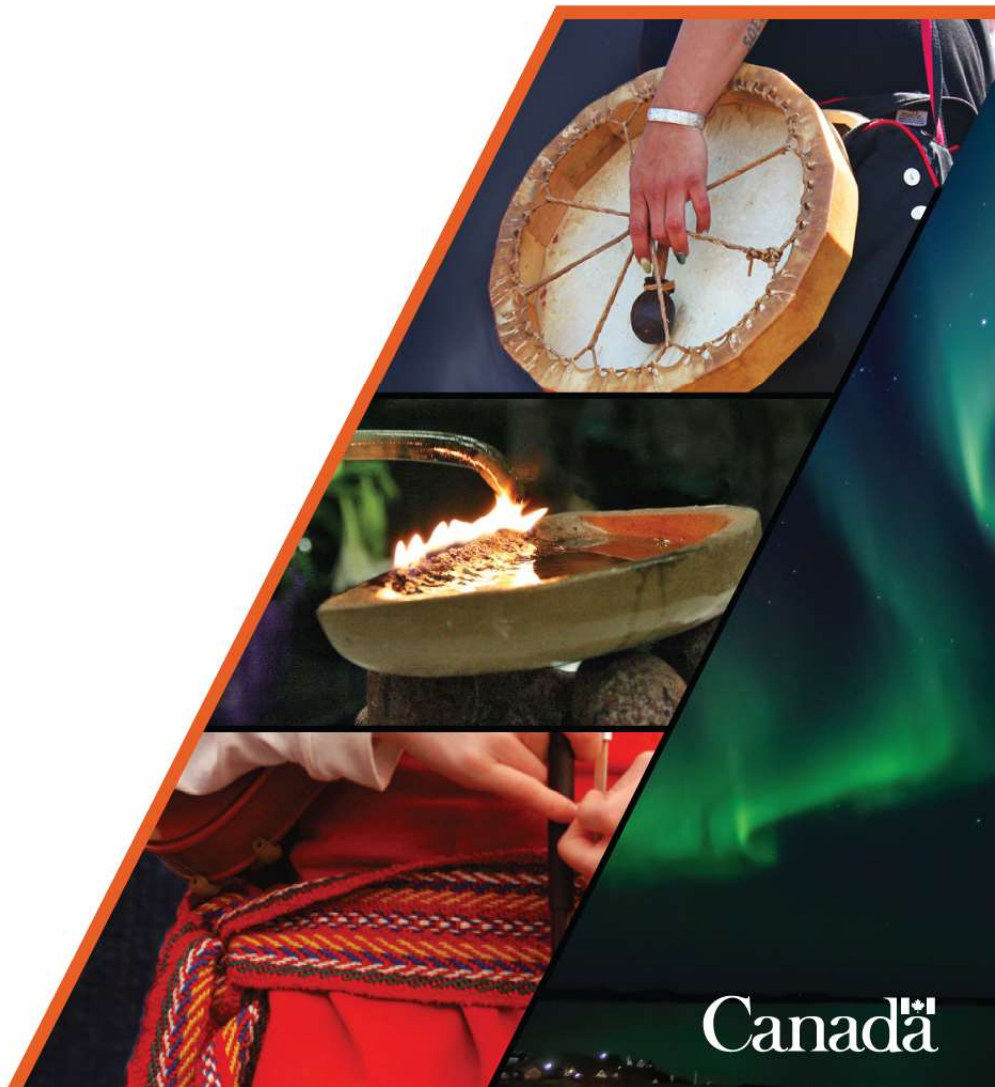




CIRNAC Comments to NIRB

Re: Notice of Screening for Government of Nunavut's "CD-Wastewater Treatment Plant" Project Proposal



Nunavut Regional Office
918 Sivumugiaq Street
Iqaluit, NU, X0A 3H0

Your file - Votre référence
24WA002
Our file - Notre référence
GCdocs#130849685

November 25, 2024

Tundra Kuliktana
Screening Officer
Nunavut Impact Review Board
P.O. Box 1360
Cambridge Bay, NU, X0B 0C0
via NIRB public registry

Re: Notice of Screening and Comment Request for Government of Nunavut's "CD-Wastewater Treatment Plant" Project Proposal

Dear Tundra Kuliktana,

On November 4, 2024, the Nunavut Impact Review Board (NIRB) invited parties to comment on Government of Nunavut's "CD-Wastewater Treatment Plant" project proposal. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) offers the responses below as it pertains to the NIRB's request:

Whether the project proposal is of a type where the potential adverse effects are highly predictable and mitigable with known technology, (and providing any recommended mitigation measures).

CIRNAC notes that while potential adverse effects resulting from the project (i.e., construction and fuel-based activities) are likely predictable and mitigable with known technology, the Proponent has not clearly defined potential impacts of the project on the environment or proposed mitigation measures. For example, in the Identification of Environmental Impacts matrix, the Proponent indicated that positive impacts would be realized for sediment and soil quality (among others) during the construction phase of the project, but it did not provide a description of potential negative impacts associated with construction (e.g., fuel spills) or proposed mitigation measures.

CIRNAC recommends that the Proponent clearly describe potential impacts that are reasonably expected from the project and proposed mitigation measures. Some best management practices that the Proponent should consider to mitigate potential adverse effects from the project, include, but are not limited to:

- Refuelling of all equipment, as well as the storage of fuel, a minimum of thirty-one (31) meters away from the high water mark of any waterbody;
- Using a secondary containment or a surface liner when storing barreled fuel and chemicals at all locations;



- Using drip pans or other equivalent devices when refuelling equipment on the site to aid in the prevention of fuel spills;
- Implementing sediment control measures on disturbed areas before, during, and after construction; and
- Selecting ground that is capable of supporting heavy equipment and vehicles, to minimize land disturbance.

Any matter of importance to the Party related to the project proposal.

Permafrost Mitigation and Monitoring

CIRNAC notes that the Proponent intends to use insulating materials around the foundation to minimize heat transfer, but it is unclear if any permafrost monitoring has been undertaken to help inform site selection or if monitoring is planned after construction, to monitor potential changes in the thermal condition of permafrost. For instance, the map of the project area identifies the presence of several boreholes around the perimeter of the proposed wastewater treatment plant (WWTP), but it is unclear if thermistors have been, or will be, installed. CIRNAC recommends that the Proponent clarify if permafrost monitoring has been undertaken to inform site selection and whether monitoring is planned after construction.

Sludge Management

CIRNAC notes that the new WWTP is intended to replace the existing wastewater lagoon system (3-tier lagoon, emergency lagoon, and P-Lake), based on the information provided in the Proponent's application to the NIRB. This is further noted in the Proponent's application to the Nunavut Planning Commission, which states: "*[the] existing 3 cell waste water lagoons are not performing to the specs. Design and Construction [of the] new Water Treatment Plant is in process to replace [the] original waste water treating system.*"

CIRNAC is seeking clarification on the sludge disposal strategy described by the Proponent, as it appears the Proponent intends to deposit sludge into the 3-tier lagoon, a facility that does not appear to be currently performing to specifications. For instance, in the Waste Management section of the Revised NIRB application, the Proponent states: "*Sludge to be disposed at [the] existing 3-tiered lagoon*". CIRNAC also notes that the Proponent did not describe how it would manage this lagoon during the lifecycle of the new WWTP (e.g., decanting water, sludge monitoring and removal). CIRNAC recommends that the Proponent clarify its sludge disposal strategy and how it intends to manage any lagoon(s) in a manner that minimizes impacts to receiving terrestrial and aquatic environments.

Potential for Positive Effects to Inuit through Employment, Training, and Contracting Opportunities

CIRNAC recommends that the Proponent prioritize the employment, training, and contracting of local Inuit and Inuit-owned businesses when implementing project activities. Such efforts will allow for positive effects to be realized by Kinngait community members. As a result, Kinngait Inuit and Inuit-owned businesses should be prioritized in any project-related employment, training, and contracting opportunities that may be made available.

Consultation with Interest Parties



CIRNAC recommends that the Proponent continue to consult relevant organizations and individuals regarding its project proposal, including representatives from the Municipality of Kinngait. As part of any consultation activities, several issues should be considered, including, but not limited to:

- Incorporation of Inuit Qauijimajatuqangit into project activities;
- Mitigation measures designed to prevent any disturbance to the environment;
- Training and employment opportunities for Inuit and community members;
- Procurement opportunities for local and Inuit-owned businesses; and
- Regular updates on the status of project activities, including plans for managing the existing wastewater lagoon system following its eventual decommissioning.

CIRNAC appreciates the opportunity to provide comments and looks forward to working with the NIRB and the Proponent throughout any further phases related to this project. Should you have any questions, please contact John MacInnis or David Abernethy by e-mail at john.macinnis@rcaanc-cirnac.gc.ca or david.abernethy@rcaanc-cirnac.gc.ca.

Sincerely,



Courtney White
A/Manager, Impact Assessment

